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March 3, 2023

Via ECF

The Honorable Michael A. Hammer,
United States Magistrate Judge
Martin Luther King, Jr. Federal Building
And Courthouse, 2nd Floor
50 Walnut Street
Newark, New Jersey 07102

Re: *Bianchi v. Samsung Electronics America, Inc. et al.*
Civil Action No.: 2:17-cv-01263-CCC-MAM

Dear Judge Hammer:

This firm, along with Squire Patton Boggs (US) LLP, represents defendant, Samsung Electronics America, Inc. ("SEA"), in the above-referenced matter. As per Your Honor's direction in the Order of January 10, 2023, we are providing a joint status report.

The parties are still in the final stage of implementing a novel and complex Settlement Agreement reached with the assistance of the Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.). Further progress has been made since our last joint status report, but we still need some additional time to complete implementation of the settlement outreach terms. We therefore respectfully request that Your Honor allow us to report back in May 2023.

Respectfully,

/s/ James J. O'Hara

JAMES J. OHARA

On behalf of Defendant,
Samsung Electronics America, Inc.

Respectfully,

/s/ Jonathan Shub

On behalf of Plaintiffs

Cc: Honorable Dennis M. Cavanaugh, U.S.D.J. (Ret.)